

ATTACHMENT I – Response to Comments: Donald C. Dailey

Comments and Suggested Revisions on the Draft Title V Permit submitted by Donald Dailey, President of Gallatin Steel, LLC of Warsaw, Gallatin County, Kentucky. The comments below have been paraphrased from their original presentation to facilitate response. The unaltered comments and supporting documents are included in their entirety at the end of this section.

1. **Comment:** Gallatin Steel claims that the Kentucky Court of Appeals has ruled that Gallatin Steel and Harsco are not a single source. That decision is being appealed to the Kentucky Supreme Court. Gallatin Steel believes that the ultimate decision in this case should be applicable to this permit as a matter of law and requests that the language under SECTION A – Permit Authorization, (Paragraph 4) be changed to reflect the final decision.

Division's response: The Division acknowledges the comment. Because of the pending legal issues, however, no change will be made.

2. **Comment:** Under **SECTION B, Emission Points 0E1 & 0E2, 3. Testing Requirements**: Condition (e), Gallatin Steel requests a change to allow SO₂ emission rates be determined by testing flow rates in the 2 DEC [direct evacuation control system] ducts only. This revision is necessary because, as agreed by the Division and Gallatin Steel, Gallatin Steel has installed the required SO₂ CEM equipment in the DEC ducts, and the required flow test has been performed and submitted to the State. This flow test was completed on May 5-6, 2004 and submitted to the State for approval. EPA Methods 1 and 2 as published in 40 CFR 60, Appendix A were followed.

Division's response: The Division agrees and has made the proposed changes.

3. **Comment:** Under **SECTION B, Emission Points 0E1 & 0E2, 4. Specific Monitoring Requirements**: Condition (c)(iii), Gallatin requests that the language be changed to be consistent with the language for other Method 9 observations in the permit.

Division's response: The Division agrees and has made the proposed changes.

4. **Comment:** Under **SECTION B, Emission Points 0E1 & 0E2, 6. Specific Reporting Requirements**: Condition (b), Gallatin requests that the language be changed from “pounds per liquid steel tapped” to “pounds per liquid steel produced” in order to be consistent with the language under **2. Emission Limitations**: Conditions (c), (d) and (e) **Compliance demonstrations**: (ii).

Division's response: The Division agrees and has made the proposed changes.

5. **Comment:** Under **SECTION B, Emission Points 0RP & OTR**, Gallatin Steel believes that the “O” in “OTR” should be a “0” so that the line is “0RP & 0TR”.

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Division's response: The Division agrees and has made the proposed changes.

6. **Comment:** Under **SECTION B, Emission Points 0S1 & 0S2, 0B1 & 0B2** Constructed August 1997, Gallatin Steel requests that the dust collector equipment be removed as this equipment refers to the second melt shop which has been removed from the permit.

Division's response: The Division agrees and has made the proposed changes.

7. **Comment:** Under **SECTION B, Emission Points 0S1 & 0S2, 0B1 & 0B2, Control Device**, Gallatin Steel requests that the language be changed to read "Dust collectors, Bin-Vents and various dust collection and prevention devices."

Division's response: The Division agrees and has made the proposed changes.

Comment: Under **SECTION B, Emission Points 0S1 & 0S2, 0B1 & 0B2, 7. Specific Control Equipment Operating Conditions:** Conditions (a), (d), (h) and (l), Gallatin Steel requests that the control device described be changed from "baghouse" to the more accurate "dust collector". This change would make the language consisted with condition (i) and differentiate between the Melt Shop baghouse and the miscellaneous dust collectors.

Division's response: The Division agrees and has made the proposed changes.